

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

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ADAPTIX, INC.,	)
	)
Plaintiff,	)
	)
v.	) Civil Action No. 6:12-cv-00017 (LED)
	)
AT&T, INC.,	)
AT&T MOBILITY LLC,	)
LG ELECTRONICS, INC. and	) <b>JURY TRIAL DEMANDED</b>
LG ELECTRONICS USA, INC.,	)
	)
Defendants.	)
	)

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**PLAINTIFF'S REPLY TO THE COUNTERCLAIMS  
OF DEFENDANTS LG ELECTRONICS, INC. AND  
LG ELECTRONICS USA, INC.**

Plaintiff, ADAPTIX Inc. (“ADAPTIX”), replies to the counterclaims of defendants, LG Electronics, Inc. and LG Electronics USA, Inc. (together “LG”), as follows:

**COUNTERCLAIMS**

1. No response required but, to the extent that any response is required, denied.
2. Admitted.
3. Admitted.
4. Admitted.

**JURISDICTION AND VENUE**

5. Admitted.
6. Admitted.
7. Admitted.

**FIRST COUNTERCLAIM**  
(Infringement of the '212 Patent)

8. Admitted.
9. ADAPTIX admits the allegations of the first sentence of paragraph 9 and denies the remaining allegations thereof.

**SECOND COUNTERCLAIM**  
(Validity of the '212 Patent)

10. Admitted.
11. Denied.
12. ADAPTIX admits the allegations of the first sentence of paragraph 12 and denies the remaining allegations thereof.

**THIRD COUNTERCLAIM**  
(Infringement of the '748 Patent)

13. Admitted.
14. ADAPTIX admits the allegations of the first sentence of paragraph 14 and denies the remaining allegations thereof.

**FOURTH COUNTERCLAIM**  
(Validity of the '748 Patent)

14. Admitted.
15. Denied.
16. ADAPTIX admits the allegations of the first sentence of paragraph 16 and denies the remaining allegations thereof.

WHEREFORE, ADAPTIX respectfully requests that this Court:

- A. Enter judgment in favor of ADAPTIX on all issues set forth in LG's Answer, Affirmative Defenses and Counterclaims;

- B. Deny all relief requested in LG's Answers, Affirmative Defenses and Counterclaims;
- C. Grant the relief requested by ADAPTIX in its complaint, and
- D. Grant ADAPTIX such further relief as this Court may deem just and proper.

**JURY DEMAND**

ADAPTIX demands trial by jury on all issues set forth in LG's Answer, Affirmative Defenses, and Counterclaims so triable.

Date: June 6, 2012

**ADAPTIX, INC.**

By: Paul J. Hayes (w/permission Wes Hill)  
Paul J. Hayes – LEAD ATTORNEY  
Dean G. Bostock  
**HAYES, BOSTOCK & CRONIN LLC**  
300 Brickstone Square, Suite 901  
Andover, MA 01810  
Tel: (978) 809-3850  
Fax: (978) 809-3869  
Email: [phayes@hbcllc.com](mailto:phayes@hbcllc.com)  
Email: [dbostock@hbcllc.com](mailto:dbostock@hbcllc.com)

T. John Ward, Jr.  
Texas State Bar No. 00794818  
J. Wesley Hill  
Texas State Bar No. 24032294  
**WARD & SMITH LAW FIRM**  
P.O. Box 1231  
Longview, TX 75606  
Tel: (903) 757-6400  
Fax: (903) 757-2323  
Email: [jw@wsfirm.com](mailto:jw@wsfirm.com)  
Email: [wh@wsfirm.com](mailto:wh@wsfirm.com)

**ATTORNEYS FOR THE PLAINTIFF  
ADAPTIX, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on this the 6th day of June, 2012.

/s/ Wesley Hill

Wesley Hill